# **EXHIBIT 4**

### Ong, Julia

From: Aylesworth, Samuel <saylesworth@cambridgema.gov>

**Sent:** Wednesday, October 07, 2015 9:41 AM

To: Ong, Julia

Cc: Prussia, Kevin S; Williams, Chaloea; MSegal@aclum.org

**Subject:** RE: Soto v. City of Cambridge - conference

### Good morning Julia,

Thanks, let's hold our conference on Friday, October  $16^{th}$  at 10am or another time that morning if that specific time doesn't work for you.

As for the discovery requests that you've propounded, the Court's Order makes no mention of allowing such requests. Indeed, at the hearing on September 21<sup>st</sup>, Magistrate Judge Dein expressly rejected reopening discovery on this issue. Furthermore, there is no basis in the rules of civil procedure for my client to respond to these requests within six (6) days of their service.

I'm happy to discuss further at our conference next week.

Thanks, Sam

Samuel A. Aylesworth Assistant City Solicitor City of Cambridge 795 Massachusetts Avenue Cambridge, MA 02139 617-349-4121 (phone) 617-349-4134 (fax)

From: Ong, Julia [mailto:Julia.Ong@wilmerhale.com]

Sent: Tuesday, October 06, 2015 1:02 PM

To: Aylesworth, Samuel <saylesworth@cambridgema.gov>

**Cc:** Prussia, Kevin S < <a href="mailto:Kevin.Prussia@wilmerhale.com">Kevin.Prussia@wilmerhale.com</a>; Williams, Chaloea < <a href="mailto:Chaloea.Williams@wilmerhale.com">Chaloea.Williams@wilmerhale.com</a>;

MSegal@aclum.org

**Subject:** RE: Soto v. City of Cambridge - conference

Hi Sam,

I am unavailable on October 13, but am available to confer on October 8 or 9<sup>th</sup> in the afternoon. Alternatively, I am available in the afternoon on October 15<sup>th</sup> or the morning of October 16<sup>th</sup>. Per the Court's order, please provide the City's responses to Ms. Soto's supplemental discovery requests by October 12.

Best, Julia

Julia Ong | WilmerHale

60 State Street

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Boston, MA 02109 USA +1 617 526 6744 (t) +1 617 526 5000 (f) julia.ong@wilmerhale.com

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From: Aylesworth, Samuel [mailto:saylesworth@cambridgema.gov]

Sent: Thursday, October 01, 2015 4:40 PM

To: Ong, Julia

Subject: Soto v. City of Cambridge - conference

Hi Julia,

As you know the Court required the parties to confer on Monday, October 12. However, my office is closed that day as it is Columbus Day. Can we instead hold our telephone conference on Tuesday, October 13? Shall we say 4pm?

Thanks, Sam

Samuel A. Aylesworth Assistant City Solicitor City of Cambridge 795 Massachusetts Avenue Cambridge, MA 02139 617-349-4121 (phone) 617-349-4134 (fax)